PRITT DECL. ISO UBER'S ADMIN. MTN TO FILE UNDER SEAL EXHIBITS TO MTN TO COMPEL RESPS. TO DOC. REQUESTS AND INTERROGATORIES, ENFORCE ORDER, AND COMPEL 30(B)(6)

TESTIMONY

CASE NO. 3:17-CV-00939-WHA

Judge:

Hon. Jacqueline Scott Corley

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I, Maxwell V. Pritt, declare as follows:

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1. I am counsel at the law firm of Boies Schiller Flexner LLP representing Defendants Uber Technologies Inc. and Ottomotto LLC (collectively, "Uber") in this matter. I am a member in good standing of the Bar of the State of California. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Uber's Administrative Motion to File Under Seal Exhibits to Their Motion to Compel Responses to Document Requests and Interrogatories, Enforce the Court's Order on Search Terms, and Compel 30(b)(6) Testimony.

I have reviewed the following exhibits and only the portions identified below merit 2. sealing:

	seams.		
12	Document	Portions to Be Filed Under Seal	Designating Party
13	Letter Brief to Compel	Highlighted Portions	Plaintiff
	Responses to Document	Triginighted Fortions	1 Idilitiii
14	Requests and Interrogatories,		
15 16	Enforce Court Order on		
	Search Terms, and Compel		
	Production of 30(b)(6)		
10	Witness	E (; D	DI : (:CC
17	Exhibit 1 to the Pritt Declaration ISO Letter Brief	Entire Document	Plaintiff
	to Compel Production of		
18	Documents ("Pritt		
	Declaration")		
19	Exhibit 2 to the Pritt	Entire Document	Plaintiff
20	Declaration		
20	Exhibit 3 to the Pritt	Entire Document	Plaintiff
21	Declaration		D1 : ::::::::::::::::::::::::::::::::::
	Exhibit 4 to the Pritt	Entire Document	Plaintiff
22	Declaration Exhibit 5 to the Pritt	Entire Document	Plaintiff
	Declaration	Entire Document	Fiamum
23	Exhibit 6 to the Pritt	Entire Document	Plaintiff
2.4	Declaration	Zinii o o o o o o o o o o o o o o o o o o	
24	Exhibit 7 to the Pritt	Entire Document	Plaintiff
25	Declaration		
	Exhibit 8 to the Pritt	Highlighted Portions	Plaintiff
2627	Declaration District	E.C. D.	DI : «:CC
	Exhibit 9 to the Pritt Declaration	Entire Document	Plaintiff
	Exhibit 10 to the Pritt	Entire Document	Plaintiff
20	Declaration	Little Document	
28	Decimination	<u> </u>	1
		1	

1	3. The highlighted portions of the Letter Brief and Exhibit 8; and the entirety of		
2	Exhibits 1, 2, 3, 4, 5, 6, 7, 9, and 10, contain information that I understand Waymo designated or		
3	considers to be "Highly Confidential – Attorneys' Eyes Only" under the Protective Order in this		
4	case.		
5	4. Uber's request to seal is narrowly tailored to information Waymo designated or		
6	considers "Highly Confidential – Attorneys' Eyes Only" under the Protective Order, or asked to		
7	be sealed.		
8	I declare under penalty of perjury that the foregoing is true and correct. Executed this		
9	15th day of August, 2017 at Oakland, California.		
10			
11	BOIES SCHILLER FLEXNER LLP		
12	By: /s/ Maxwell V. Pritt		
13	Maxwell V. Pritt		
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16	ATTESTATION OF E-FILED SIGNATURE		
17	I, Karen L. Dunn, am the ECF User whose ID and password are being used to file this		
18	document. In compliance with General Order 45, X.B., I hereby attest that Maxwell V. Pritt has		
19	concurred in this filing.		
20	Dated: August 15, 2017		
21	/s/ Karen L. Dunn		
22	Karen L. Dunn		
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